

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROBERT T. BROCKMAN,)	
Plaintiff,)	
)	Case No. 22-cv-00202
v.)	
)	
UNITED STATES OF AMERICA)	
Defendant.)	

Declaration of Herbert W. Linder Pursuant to 28 U.S.C. § 1746

1. I am employed as an attorney with the United States Department of Justice, Tax Division, Southwestern Civil Trial Section. In that capacity, I am one of the attorneys assigned the responsibility for handling the case of the *Robert T. Brockman v. United States*. In connection with this case, I have received certain files from the Internal Revenue Service, the taxpayer, Department of the Treasury, third parties, and the United States Department of Justice. The Government Exhibits listed below are numbered 40-47.

2. Government Exhibit 40 is the formation papers and Texas Secretary of State filing records for Brockman Elk Creek Lot 16 LLC which came from the Texas Secretary of State records on its state government website.

3. Government Exhibit 41 is a screen shot of Texas Secretary of State filing records for the registered agent for Brockman Elk Creek Lot 16 LLC which came from the Texas Secretary of State records on its state government website.

4. Government Exhibit 42 is the declaration of IRS Revenue Agent Paxton.

5. Government Exhibit 43 is a deed for Lot 16 in Elk Creek Ranch located in Rio Blanco County, Colorado, transferring the property to Brockman Elk Creek Lot 16 LLC which came from the Rio Blanco County records.

6. Government Exhibit 44 is a deed for Lot 16 in Elk Creek Ranch located in Rio Blanco County transferring the property from Brockman Elk Creek Lot 16 LLC which came from the Rio Blanco County records.

7. Government Exhibit 45 are real property detail records from Rio Blanco County Tax Assessor for Lot 16 in Elk Creek Ranch located in Rio Blanco County which came from the Rio Blanco County Tax Assessor records on its county government web site.

8. Government Exhibit 46 is a statement of authority for Brockman Elk Creek Lot 16 LLC from Rio Blanco County Tax Assessor for Lot 16 in Elk Creek Ranch located in Rio Blanco County which came from the Rio Blanco County Tax Assessor records on its county government web site.

9. Government Exhibit 47 is a screen shot of Texas Secretary of State filing records for the manager of Brockman Elk Creek Lot 16 LLC which came from the Texas Secretary of State records on its state government web site.

10. Government Exhibit 48 is the hearing transcript from the June 28, 2022, hearing in this Case No. 22-cv-00202 which came from the Court Reporter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd., day of July 2022.

/s/ Herbert W. Linder

Herbert W. Linder